



Greenberg Traurig, LLP has requested a telephonic status conference with the Court (“Greenberg’s Motion”). [Dkt. 133.] Hunton & Williams LLP (“Hunton”) files this response to explain why it believes a status conference is premature and unnecessary at this time.

1. The parties are currently in the middle of briefing two motions:

a. The first motion is Plaintiffs’ Opposed Motion for Entry of a Discovery Scheduling Order in Connection with the Receiver and Committee Claims and to Defer Class Certification Scheduling Until the Determination of Class Certification Issues in Related Action (“Plaintiffs’ Motion”). [Dkt. 131.] Hunton filed its response in opposition to Plaintiffs’ Motion on June 23 (“Hunton’s Resp. Br.”) [Dkt. 134], Greenberg filed its response in opposition on June 22 [Dkt. 132], and Plaintiffs’ reply in support of their Motion is due by July 7.

b. The second motion is Hunton’s Motion to Strike the Class Allegations and Dismiss the Class Claims (“Motion to Strike”) [Dkt. 135], which Hunton filed on June 23. Plaintiffs are entitled to July 14 to respond to Hunton’s Motion to Strike, and Hunton will then have until July 28 to file its reply.

2. Hunton respectfully submits that it would be most appropriate for the Court to wait until Plaintiffs’ Motion and Hunton’s Motion to Strike are fully briefed before determining whether a status conference is warranted. If the Court grants the Motion to Strike, the parties will be able to meet and confer to discuss a proposed schedule for the remaining non-class claims. Alternatively, if the Court denies the Motion to Strike, Hunton requests that the Court enter an order scheduling class certification proceedings. (*See* Hunton’s Resp. Br. Section III.) Accordingly, Hunton respectfully opposes the request for a status conference at this time as premature and unnecessary.

3. If the Court determines that a status conference is warranted at this time, Hunton will—of course—participate in any way that the Court desires.

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 23, 2015, I electronically filed the foregoing **Hunton & Williams's Response to Greenberg Traurig's Motion for a Telephonic Status Conference with the Court**, with the clerk of the U.S. District Court, Northern District of Texas, using the electronic case filing (ECF) system of the court. The ECF system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this notice as service of this document by electronic means. Copies will be sent to those indicated as non-registered participants by U.S. Mail or facsimile at the addresses of their counsel of record or last known residence.

s/ Jeffrey D. Colman

JEFFREY D. COLMAN